

TAYLOR PIPELINE
CONSTRUCTION, INC.

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C.A. NO. 1-04-CV0599

VS.
DIRECTIONAL ROAD BORING, INC.,
DAVID J. O'LEARY and
HYPOWER, INC.

JURY

PLAINTIFF'S SUPPLEMENT TO PLAINTIFF'S
AMENDED RESPONSE TO DEFENDANTS'
MOTIONS FOR SUMMARY JUDGMENT

TAYLOR PIPELINE	§	
CONSTRUCTION, INC.	§	C.A. NO. 1-04-CV0599
	§	
VS.	§	JURY
DIRECTIONAL ROAD BORING, INC.,	§	
DAVID J. O'LEARY and	§	
HYPOWER, INC.	§	
BACKGROUND		

**PLAINTIFF'S SUPPLEMENT TO PLAINTIFF'S AMENDED RESPONSE
TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Taylor Pipeline Construction, Inc. ("Taylor Pipeline"), and files this Plaintiff's Supplement to Plaintiff's Amended Response to Defendants' Motions for Summary Judgment and, in support thereof, respectfully shows as follows:

I.

Pursuant to this Honorable Court's Request, Plaintiff Taylor Pipeline submits the following to Plaintiff's Amended Response to Defendants' Motions for Summary Judgment:

- 1) Reporter's Certification
For the Deposition of James D. Taylor
October 27, 2005
Deposition Unsigned
- 2) Reporter's Certification
Oral Deposition of Julia Taylor
November 15, 2005
Deposition Unsigned
- 3) Reporter's Certification
Oral Deposition of Thomas B. Neild
November 11, 2005
Deposition Unsigned

BEAUMONT DIVISION

TAYLOR PIPELINE
CONSTRUCTION, INC.

§

C.A. NO. 1-04-CV0599

§

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VS.
DIRECTIONAL ROAD BORING, INC.,
DAVID J. O'LEARY and
HYPOWER, INC.
BACKGROUND

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JURY

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**PLAINTIFF'S SUPPLEMENT TO PLAINTIFF'S AMENDED RESPONSE
TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Taylor Pipeline Construction, Inc. ("Taylor Pipeline"), and files this Plaintiff's Supplement to Plaintiff's Amended Response to Defendants' Motions for Summary Judgment and, in support thereof, respectfully shows as follows:


I.

Pursuant to this Honorable Court's Request, Plaintiff Taylor Pipeline submits the following to Plaintiff's Amended Response to Defendants' Motions for Summary Judgment:

- 1) Reporter's Certification
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November 15, 2005
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Oral Deposition of Thomas B. Neild
November 11, 2005
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WHEREFORE, PREMISES CONSIDERED, Plaintiff, Taylor Pipeline respectfully prays
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Defendants' Motions for Summary Judgment be denied, and that Plaintiff, Taylor Pipeline be
awarded such other relief, general or special, legal or equitable, to which it may be justly
entitled.

Respectfully submitted,


By: _____
MIKE JOHNSTON, TBA #10840500
FED. ID #7264
DAVID MEDEARIS, TBA #24041465
FED. ID #557586

OF COUNSEL:

SULLINS, JOHNSTON, ROHRBACH
& MAGERS
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Houston, Texas 77027
Tel 713.521.0221
Fax 713.521.3242

ATTORNEYS FOR PLAINTIFF,
TAYLOR PIPELINE CONSTRUCTION, INC.

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the 5 day of April, 2006 **PLAINTIFF'S
SUPPLEMENT TO PLAINTIFF'S AMENDED RESPONSE TO DEFENDANTS'
MOTIONS FOR SUMMARY JUDGMENT** was served electronically via e-file system,
certified mail, return receipt requested and/or hand delivery and/or by facsimile and/or by First
Class mail upon all counsel of record.



DAVID MEDEARIS